

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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AUG 25 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.
(Littlefield, Wolfforth and
Tahoka, Texas)

MM Docket No. 95-83
RM-8634

DOCKET FILE COPY ORIGINAL

TO: Chief, Allocations Branch

REPLY COMMENTS OF LEE W. SHUBERT, TRUSTEE

Lee W. Shubert, Trustee, licensee of KLLL(FM), Lubbock ("KLLL"), respectfully submits this reply to the comments of 21st Century Radio Ventures, Inc. ("Petitioner") and Emil Macha ("Macha") concerning the Commission's proposal in the above-referenced proceeding.

Introduction

Petitioner filed its application for a construction permit for a Littlefield facility in July 1993. The Commission granted that application in May 1994, by construction permit that expires in November 1995. See File No. BPH-930726BM.

Petitioner has not constructed its station in Littlefield, and apparently has no intention of doing so. Nine months after it obtained its construction permit, Petitioner filed its petition to reallocate its channel to Wolfforth, which is less than three miles outside the city limits of Lubbock. See

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Exhibit A. In defending the loss of service to over 17,000 persons in the Littlefield area, Petitioner asserts that KAIQ will remain unbuilt. Pet. Rule Making at 2-3, 4. Thus, it relies upon its intention not to comply with the requirements of its construction permit as a basis for its Lubbock move-in.

**PETITIONER'S PROPOSAL CONSTITUTES PRECISELY
THE KIND OF MANIPULATION OF FM ALLOCATION
POLICIES THAT THE COMMISSION HAS REFUSED TO
COURTENANCE**

Petitioner claims as the principal benefit of its proposal the provision of a first local service to Wolfforth. However, the Commission has "consistently given little or no weight to claimed first local service preferences if, given the facts and circumstances, the grant of a preference would appear to allow an artificial or purely technical manipulation of the Commission's 307(b) related policies."^{1/} This is exactly what Petitioner has proposed. Petitioner's proposal would eliminate the only FM channel presently allotted to Littlefield -- which must be placed in service by November 1995 under the terms of Petitioner's construction permit -- and add it to Wolfforth, a much smaller community less than three miles from Lubbock whose interests are indistinguishable from and already well served by a plethora of existing stations licensed to Lubbock.

^{1/} Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 5 FCC Rcd 7094, 7096 (1990).

The Commission's 1989 amendment to its allocation procedures gave licensees the ability to change their communities of license without opening themselves up to comparative hearings.^{2/} Petitions for reallocation would be granted whenever they would "result in a preferential arrangement of allotments" under the Commission's usual allotment priorities.^{3/} Commenters in that proceeding had voiced concern that licensees would be led to abandon rural communities in favor of suburbs of populated cities.^{4/} The Commission addressed these concerns by assuring that reallocations would be permitted only if they served the public interest as measured by the Commission's allotment priorities:

There may be situations in which, consistent with the allotment priorities and policies, a licensee may try to increase its total population served by moving, for instance, from a rural community to a suburban community. We do not believe that such a move necessarily constitutes abuse of process so long as the new community of license is preferable to the original community under our allotment criteria, although the result may be removal of some service from

^{2/} Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989) ("Allotment Order"), on reconsideration, 5 FCC Rcd 7094 (1990) ("Reconsideration Order").

^{3/} Allotment Order, 4 FCC Rcd at 4873. For FM service, those priorities are: (1) first aural service; (2) second aural service; (3) first local service; and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). Revision of FM Assignment Policies and Procedures, 90 F.C.C. 2d 88, 92 (1982).

^{4/} See Allotment Order, 4 FCC Rcd at 4871, 4873.

communities on the fringe of an urban area. The application of the allotment priorities and policies . . . will act as a barrier to the clustering of stations in major metropolitan areas. We will, however, carefully monitor these situations, and will address the issue if necessary.^{5/}

On reconsideration, the Commission reiterated and strengthened its commitment to protect against such situations:

[W]e do not intend to apply the first local service preference of our allotment criteria blindly. We recognize that an inflexible application of that preference, without further analysis, could consistently result in our finding that a reallocation leading to first local service for a suburb of a much larger adjacent metropolitan center justifies removing a local service from a more remote community. We wish to dispel any concern that our new rule would lead to such a result.^{6/}

Yet that is precisely the result proposed by this petition. The Commission's first and second priorities -- first and second aural service -- are not at issue; Littlefield and Wolfforth each will receive such aural services regardless of the outcome of this proceeding. Pet. Rule Making Tech. Exhibit Fig. 9. Petitioner thus relies heavily on the "first local service" criterion. But Wolfforth's first local service would be heaped on a mountain of service from Lubbock.^{7/} The Commission recognized in the Allotment Order that "first local service for a

^{5/} Id. at 4873.

^{6/} Reconsideration Order, 5 FCC Rcd at 7096.

^{7/} Lubbock has seven AM and fourteen FM stations and five television stations. (One of the FM stations is not on the air.)
1 Broadcasting & Cable Yearbook 1995 B-407 (1995).

suburb of a much larger adjacent metropolitan center" does not necessarily justify removing a local service from a more remote community.^{8/} Before doing so, the Commission looks at three criteria: (1) signal population coverage, i.e., the degree to which the proposed station could provide service to the adjacent metropolis as well as the suburb; (2) the size and proximity of the suburb relative to the city and whether the suburb is within the city's urbanized area; and (3) the interdependence of the suburb with the central city in terms of work patterns, media services, opinions of residents, and community institutions and services.^{9/}

^{8/} Reconsideration Order, 5 FCC Rcd at 7096.

^{9/} Id. at 3223. These are a condensed expression of the criteria set forth in Faye & Richard Tuck, Inc., 3 FCC Rcd 5374, 5378 (1988):

(1) the extent to which community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's local needs and interests; (3) whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the specified community has its own local government and elected officials; (5) whether the smaller community has its own telephone book provided by the local telephone company or zip code; (6) whether the community has its own commercial establishments, health facilities, and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising market; and (8) the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries.

Petitioner's comments ignore these criteria. Indeed, the comments barely mention Lubbock, and then only in connection with whether Wolfforth qualifies as a community at all for allotment purposes, and not in connection with the Commission's allotment priorities. Pet. for Rule Making at 2. In fact, under these criteria, Wolfforth is a classic example of the interdependent suburb for which claims of first local service should not be credited.

First, Petitioner's proposed facility would place a 1 mV/m signal over the entirety of Lubbock. Pet. Rule Making Tech. Exhibit Fig. 7A. Second, Wolfforth clearly sits in the shadow of Lubbock. It has a population of only 1,941, while Lubbock -- only three miles away -- has a population of 186,206 or about one hundred times the size of Wolfforth.^{10/} Finally, Wolfforth is clearly an integral part of the Lubbock metropolitan area.

Wolfforth has no airport or hospital; residents thus depend on Lubbock for those facilities.^{11/} It has no local media distinct from Lubbock; residents rely upon the Lubbock newspaper, radio stations and television stations. Exhibit A at 2. Its advertising market is thus indistinguishable from the Lubbock advertising market. Wolfforth's political identity is also inseparable from Lubbock. State House District 83 combines Wolfforth with most of the territory inside the "loop" (the

^{10/} Rand McNally 1995 Commercial Atlas & Marketing Guide 527, 532 (126th ed. 1995) ("Rand McNally").

^{11/} Id. at 532.

highway ringing the city) in Lubbock. Exhibit B. And Texas's 19th federal congressional district combines Wolfforth with most of Lubbock. Exhibit C. Work patterns also bind Wolfforth to Lubbock. According to Wolfforth's community fact sheet, only one of the city's few employers (apart from the school district) has over one hundred employees. Exhibit A at 5. The next five employers on the list each employ fewer than 20, and the remainder employ fewer than 10. Id.

Wolfforth would thus better be described as dependent on Lubbock than interdependent with Lubbock. The 1995 Rand McNally Commercial Atlas and Marketing Guide identifies Wolfforth as being in the Lubbock Ranally Metro Area.^{12/} Geographically, economically, politically, demographically, socially and culturally, Wolfforth's identity is inextricably bound up with Lubbock's. In fact, Wolfforth emphasizes that "Lubbock is rapidly growing in the [direction of Wolfforth]," that "[l]ess than three miles separate the two city limit signs," and that "[t]he citizens of Wolfforth have all the advantages and conveniences of a large city." Exhibit A at 5.

Perhaps the best indication of Wolfforth's dependence on and shared identity with Lubbock comes from the state of mind of Ms. Donna Hudson at Wolfforth City Hall. Asked whether any publications or literature about Wolfforth were available, she

^{12/} Rand McNally at 532. Ranally Metro Areas are designed to include "central cities, satellite communities, and suburbs" and to offer a "precise look at areas of concentrated population." Id. at 97.

answered no and stated: "We're just not big enough for that."

Landry Aff. Exhibit D at ¶ 4. Asked whether there were any radio or television stations in Wolfforth, she answered no and stated: "Being right here in Lubbock," there is "no need to have those things when we have them right here at our fingertips." Landry Aff. Exhibit D at ¶ 3. These views of a Wolfforth official speak volumes about the state of mind of residents in Wolfforth,^{13/} who appreciate well their shared identity with Lubbock.

Littlefield, by contrast, is a highly independent city. The Commission has twice underscored the need for a local FM service there, in 1988 and as recently as 1991.^{14/} There is nothing in the petition that warrants a change from those policy judgments. Littlefield has a population of 6,489, according to the 1990 Census.^{15/} It is the county seat of Lamb County.^{16/} It has its own local government, independent school district, police department, fire department and municipal airport.^{17/} It has a railroad (the Atchison, Topeka & Santa Fe), a post office, four banks, a hospital, and other businesses, many of which identify

^{13/} See Fed. R. Evid. 803(3).

^{14/} Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Littlefield, Texas), 6 FCC Rcd 1503 (Allocations Branch, Mass Media Bur. 1991); Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Hereford and Littlefield, Texas; and Texico, New Mexico), 3 FCC Rcd 6516 (Pol'y & Rules Div., Mass Media Bur. 1988).

^{15/} Rand McNally at 527.

^{16/} Id.

^{17/} Id.

themselves with Littlefield.^{18/} It has its own local newspaper, AM radio station and -- until now -- FM station allotment.^{19/} In light of these factors, the Commission's allotment criteria clearly disfavor crediting Wolfforth with a "first local service" and removing the only authorized FM facility from Littlefield.

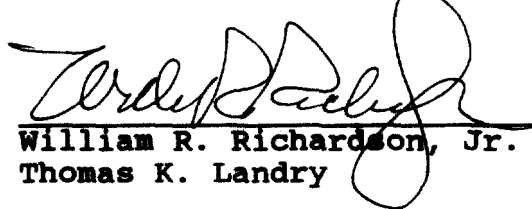
^{18/} Id. These include Littlefield Butane Co., Littlefield Carpet Service Cleaners, Littlefield Christian Academy, Littlefield Cleaners, Littlefield Clinic, Littlefield Delinting Co., Littlefield Farmers Cooperative Gin, Littlefield Feedyard, Littlefield Golf Course, Littlefield Manor Apartments, Littlefield Mercantile, Littlefield Radiator Service, Littlefield Self Storage, Littlefield Service Center and Littlefield Veterinary Hospital. Search of SelectPhone Central Region CD-Rom Database (2.0 ed. 1995).

^{19/} The licensee of Littlefield's only operational station, KZZN(AM), has now expressed interest in a new FM allotment in Littlefield. Comments of Emil Macha. This newfound interest merits little weight. Absent showing a valid basis for delay, the Commission has required Petitioner to initiate FM service to Littlefield by November 1995. See 47 C.F.R. § 73.3534 (1995). Macha, in contrast, was nowhere in sight during the five years after the FM allocation to Littlefield and before Petitioner's application for a construction permit. To permit Petitioner to abandon the FM service to Littlefield required to be initiated by November 1995 in favor of this speculative possibility for local service at some indefinite point in the future would clearly disserve the public interest.

CONCLUSION

For the reasons stated above, KLLL urges that the petition to amend Section 73.202(b) be rejected.

Respectfully submitted,



William R. Richardson, Jr.
Thomas K. Landry

Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037
(202) 663-6000

Counsel for Lee W. Shubert, Trustee

August 25, 1995

EXHIBIT A



COMMUNITY FACT SHEET



Wolfforth, Texas

Lubbock County

1995



COMMUNITY SURVEY

LOCATION

Nearby Metropolitan Cities	Distance in Miles
<u>Lubbock, Texas</u>	<u>3</u>
<u>Amarillo, Texas</u>	<u>123</u>
<u>Dallas, Texas</u>	<u>301</u>
Average Elevation	<u>3,238'</u>

POPULATION

	1990	1980	1970
County	<u>222,836</u>	<u>211,851</u>	<u>179,295</u>
City	<u>1,941</u>	<u>1,701</u>	<u>1,090</u>

Estimated Present Population City 2,400

Estimated Present Population County 224,748

CLIMATE

	Annual Average	Monthly Average
Temperature	<u>61°</u>	
		January <u>39.6°</u>
		July <u>80.6°</u>
Annual Average Rainfall (inches)		<u>22.39"</u>
Annual Average Snowfall (inches)		<u>10.6"</u>
Days Between Killing Frost	<u>288</u>	
Days Over 90 Degrees	<u>79</u>	
Heating Degree Days Total	<u>3,994</u>	Average Yearly
Cooling Degree Days Total	<u>1,700</u>	Average Yearly
Relative Humidity Percent by Hour: (Average)		
00	<u>71%</u>	0600 <u>82%</u>
		1200 <u>46%</u>
		1800 <u>44%</u>

COMMUNITY/RECREATION FACILITIES

Churches (Number): Protestant 4 Catholic 1
Jewish -0-

Number Motels/Hotels -0- Total Rooms -0-

Country Clubs -0- Civic Clubs 2

Museums -0- Libraries 1

City Intramural Sports Program? Yes

Number of Parks 60-Lubbock Local 1

Nearby Lakes Buffalo Springs, White River Lake, Lake Ransom Canyon, Lake MacKenzie

Other Recreation Facilities in Immediate Area:

5 Golf Courses-Lubbock; 3 Racquet Clubs-Lubbock;

5 Swimming Pools-Lubbock

Area Recreation: Boating, Fishing, Hunting, Camping, many more within 15-mile radius.

EDUCATION

Public School Budget: 19 94-95 \$ 23,251,121
Bonded Indebtedness \$ 34,578,739

	Number Schools	Number Teachers	Number Grades	Enrolled
Elementary	<u>4</u>	<u>153</u>	<u>PreK-4</u>	<u>2,320</u>
Intermediate	<u>1</u>	<u>44</u>	<u>5 - 6</u>	<u>878</u>
Junior High	<u>1</u>	<u>45</u>	<u>7 - 8</u>	<u>777</u>
High School	<u>1</u>	<u>80</u>	<u>9 - 12</u>	<u>1,234</u>

Public School Special Programs Voca-Handicapped, Metal Trades Auto Mech, Bldg. Trades, Agri. Science, Voca. Home Econ., Special Education, Health Occup., Gifted/Talented

Local College(s) Texas Tech University; Lubbock Christian University; South Plains Jr. College; Wayland Baptist University

Enrollment 24,000; 1,120; 1,200; 650

Colleges Within Commuting Distance

South Plains Jr. College-30 miles

Wayland Baptist University-45 miles

HOUSING

Lubbock — Wolfforth Area

Average cost per sq. ft. for EXISTING home, three-bedroom:

High \$45 Medium \$35 Low \$30

Average cost per sq. ft. for NEW home, three-bedroom:

High \$55 Medium \$47 Low \$41

Typical Lot Size: 75'-85' x 110'-125' sq. ft.

Typical Lot Cost Range: \$5,000-\$25,000

COMMUNICATIONS

Newspaper(s) Lubbock Avalanche Journal

Daily (D) 1 Weekly (W) 2

Out of Town Papers 2

Radio Stations(s) Lubbock 8-AM; 11-FM

Television Stations(s) 6 Lubbock

Cable Television Yes-Mission Cable Channels 26+5 Premium

Telephone Service GTE

Post Office First (Class)

FINANCIAL

	Number	Total Assets
Banks	<u>11</u>	<u>\$2.31 billion</u>
Savings & Loan Associations	<u>1</u>	<u>N/A</u>
Plant Financial Assistance Available:	Yes (X) No ()	
American Bank of Commerce of Wolfforth		<u>\$178,375,000</u>

GOVERNMENT

Type of Government City Council
 Number of Councilmen 5 plus Mayor
 Police Dept. Personnel: (Full Time) 3
 Fire Dept. Personnel: (Full Time) -0-
 (Volunteer) 23
 Equipment 3 Pumps; 1 Tanker; 1 Rescue Unit
 Service Provided Industry Beyond Corporate Limits or By
 County Police, Fire, Ambulance, 911 System
 Other Law Enforcement in Area County Sheriff;
Dept. of Public Safety
 Planning Commission: Yes (X) No ()
 Zoning Regulations: Yes (X) No ()
 City Financing: 19 94-95 Total Operating Budget (including
 water, sewer, etc., but not capital improvements or debt retirement
\$884,754
 Total Tax Collections \$218,226
 Payment on Bonds & Capital Expenses \$257,174
 Bonded Debt-General Obligation \$419,000
 Revenue Bonds \$950,000

UTILITIES AND SERVICES

ELECTRICITY

Power Supplier(s) Southwestern Public Service Company
 Power Distributor(s) Southwestern Public Service Company

NATURAL GAS

Gas Supplier(s) Energas
 Gas Distributor(s) Energas
 Transmission Line Size 10" & 8"

WATER

Name of Supplier City of Wolfforth
 Source Underground Sources 12- Wells
 Maximum Daily Capacity 1,420,800 GPD
 Peak Load 658,000 GPD
 Storage Capacity: Overhead 100,000 Gals.
 Ground 500,000 Gals.

Water Cost—Industrial:

Example: 100,000 gallons per day \$230 Total Cost/Day

SEWERS

Storm Sewer: Yes () No (X) Coverage — %
 Sanitary Sewer: Yes (X) No () Coverage 99 %
 Treatment Plant: Type 3 Lagoons
 Capacity 5,000 Population Present Load 48 %
 Solid Waste Disposal Landfill — Lubbock

Sewage Cost—Industrial: (domestic)

Example: 100,000 gallons per day \$41 Total Cost/Day

OTHER FUELS

Fuel Oil Distributor(s) N/A
 Coal Source N/A
 LP Gas Distributor(s) Wolfforth L.P. Gas

MEDICAL

Hospitals: Number 7 Beds 1,900
 Clinics: Number 8 Beds —
 Rest Homes: Number 3 Beds —
 Doctors 650+ Dentists Included
 Nearest Regional Health Center Lubbock
 Trained Emergency Transportation? Yes
 Ground Yes Air Yes

LABOR ANALYSIS

Date of Report December 1993
 Work Force: County 121,482
 Radius of Labor Drawing Area 45 miles
 Esti. Available: Male 137,000 total Females 1,900 + County
 Annual Number High School Graduates 2,935 County
 Annual Number High School Graduates N/A
 Work Stoppages in Last 5 Years 7,900 County
 Manufacturing Employment 4
 Manufacturing Workers in Unions 6.7
 Unemployment Rate
 Right-to-Work Law Yes (X) No ()
 Wage and/or Labor Information Available Yes (X) No ()
 In-Plant Training Funds Available Yes (X) No ()

TRANSPORTATION

Highways Serving Area US 62-92
 Divided 4-Lane Highway Serving City? US 62-92

RAILROADS

Names Seagraves, Whiteface, and Lubbock Railroad
 Piggyback Service Yes

Frequency of Switching Service Daily
 Number of Daily Trains 2

MOTOR FREIGHT CARRIERS

Interstate Roadway, Tex-Pack, Yellow, ABF, ANR, Central,
Consolidated, Reeves, Sun
 Intrastate Big State, O&A, Central, Miletos, Tex-Pack,
Gibson (Services to New Mexico)

AIR

Local Commercial Air Service Yes (X) No ()
 Carriers Southwest, American Eagle, ASA, United Express
 Other Commercial Air Service Within Commuting Distance
 City Same Miles 9 miles
 Carriers Same
 Nearest Local Airport-Runway Length 11,500 (N/S); 8,000 (E/W)
 Paved? Yes Lights? Yes Instruments? Yes
 Charter or Private Facilities at Airport Several
 Air Freight Carriers Service City: County

BUS SERVICE

Name T.N.M.&O., Greyhound, Continental
 Intracity Service Yes (X) No ()
 Parcel Service UPS

TAXES

Tax Year **1994-1995**

Rate / **Manufacturers Real Property**

☒ \$100 ☐ \$1,000

	Tax Rate	Assess. Ratio	Effective In City	Rate Out City
City	\$.57	100 %	\$.57	\$ —
County	\$.171	100 %	\$.171	\$.171
School	\$ 1.470	100 %	\$ 1.470	\$ 1.470
State	\$ —	— %	\$ —	\$ —
Hospital	\$.1049	100 %	\$.1049	\$.1049
Water	\$.0084	100 %	\$.0084	\$.0084

TAX CATEGORIES

Type:	City		County	
Inventory	Yes (X)	No ()	Yes (X)	No ()
Machinery-Equip.	Yes (X)	No ()	Yes (X)	No ()
Retail Sales	Yes (X)	No ()	Yes ()	No (X)
Income	Yes ()	No (X)	Yes ()	No (X)

STATE TAXES

Type:	Rate	Type:	Rate
Corporate Income	-0- %	Retail Sales	7.75 %
Intangibles	-0- %	Indv. Income:	
		Minimum Rate	-0- %
		Maximum Rate	-0- %
Gasoline	20 ¢/Gal.		

AGRICULTURE

Major Products Grown and Estimated Volume Produced In Area:

Cotton — 250,000 bales; Grain — 1,977,900 cwt;

Corn Silage — 59,00 bushels

Estimated Number of Livestock Units Raised/Fed/Slaughtered In Area:

5 million fed and slaughtered in 150-mile radius

Lubbock County only — 45,000 fed

Food Processing In The Area: **Preston Meat Packers**

located in Wolfforth city limits

AVAILABLE INDUSTRIAL LAND SITES

Average Cost Per Acre For A 50-Acre Industrial Site With Utilities Adjacent to Site **\$1,500-\$10,000** /Acre

SITES

Name **North and South of Wolfforth** Size

EXISTING BUILDINGS

Size Ceiling Height Suitable For

Contact — **Wolfforth Area Chamber of Commerce**

P. O. Box 36

Wolfforth, Texas 79382

GOVERNMENT INSTALLATIONS IN AREA

	No. of Employees
Reese Air Force Base	
Full-time Military	1,419
Civilian	394+

OTHER INFORMATION

MAJOR EMPLOYERS

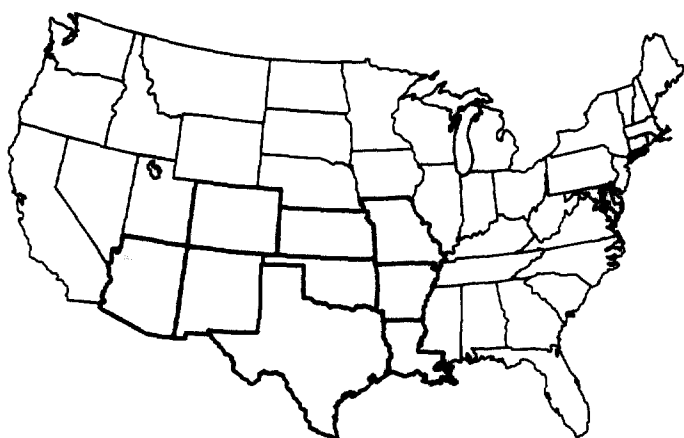
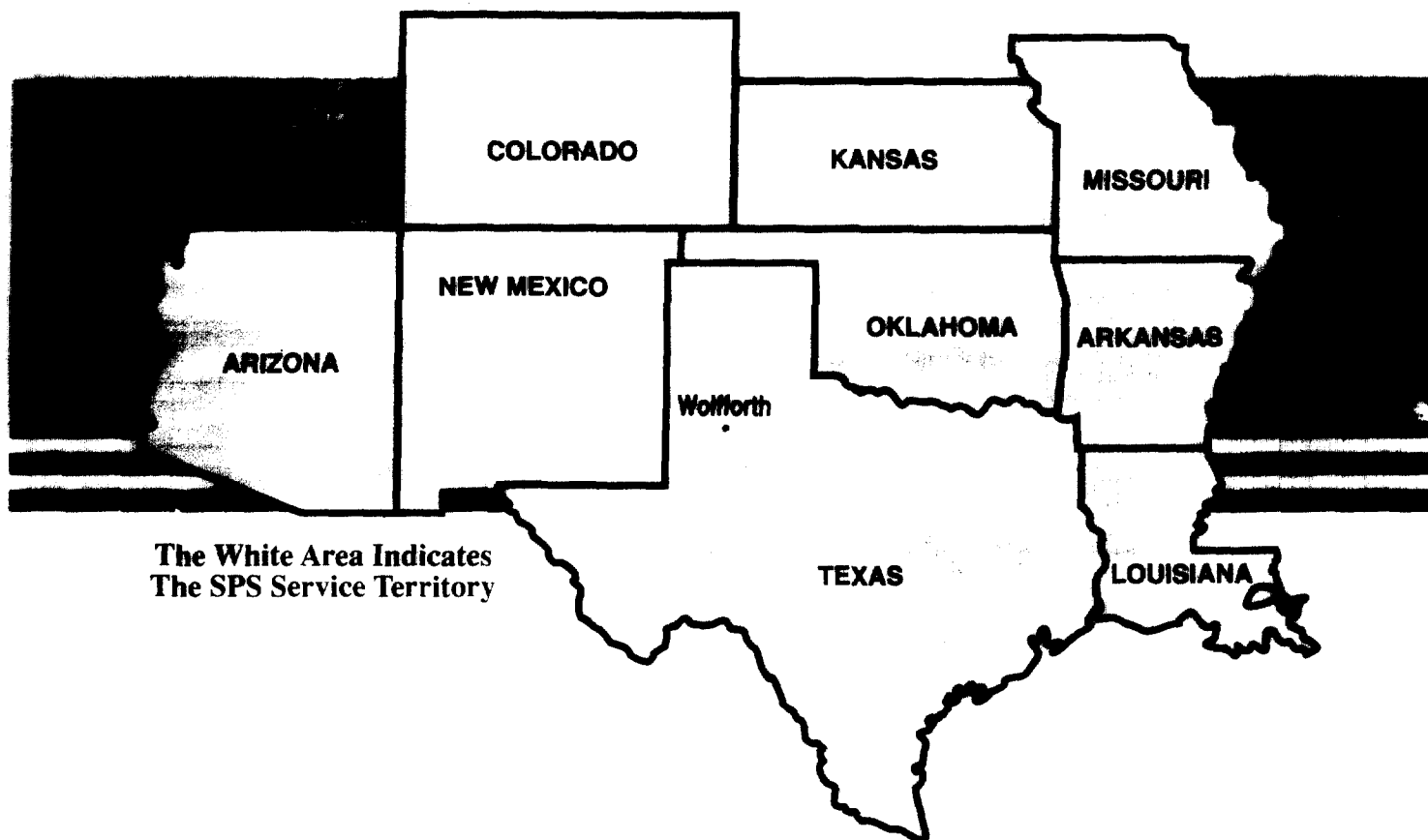
Name	Product or Service	Employees	Year Established Here	Union Yes/No % of Total
<u>Frenship Ind. School District</u>	<u>Education</u>	<u>426</u>	<u>1909-1938</u>	<u>No</u>
<u>American Bank of Commerce</u>	<u>Full service banking</u>	<u>115</u>	<u>1962</u>	<u>No</u>
<u>City of Wolfforth</u>	<u>Community services</u>	<u>17</u>	<u>1950 Inc.</u>	<u>No</u>
<u>Thriftyway Supermarket</u>	<u>Retail Grocery</u>	<u>16</u>	<u>1964</u>	<u>No</u>
<u>Rainbows End Child Care & Learning Center</u>	<u>Child care & learning</u>	<u>15</u>	<u>1987</u>	<u>No</u>
<u>Wolfforth Farmers Gin Co.</u>	<u>Cotton</u>	<u>12</u>	<u>1965</u>	<u>No</u>
<u>Rip Giffin Swift Shop No. 4</u>	<u>Grocery, Fast Food & Gas</u>	<u>10</u>	<u>1979</u>	<u>No</u>
<u>Fry Farm Equipment</u>	<u>Farm Equipment</u>	<u>8</u>	<u>1975</u>	<u>No</u>
<u>Discovery Depot</u>	<u>Child Care & Learning</u>	<u>7</u>	<u>1991</u>	<u>No</u>
<u>Herb Henderson Auctioneers</u>	<u>Auctioneers Sales</u>	<u>6</u>	<u>1963</u>	<u>No</u>
<u>Preston Meat Packers</u>	<u>Meat Processing</u>	<u>5</u>	<u>1978</u>	<u>No</u>
<u>Rosales Welding</u>	<u>Manufacturing-Custom Welding</u>	<u>3</u>	<u>1974</u>	<u>No</u>

FACTORS WE WOULD LIKE TO EMPHASIZE ABOUT OUR CITY

Wolfforth prides itself in being an attractive and progressive city. In recent months, 25 homes have been constructed. Construction has begun on a new 35 unit garden home development. A new city park is being developed. Upon completion the park will contain a 4-field baseball complex, a lake stocked for fishing, a walking and jogging path, sheltered picnic areas, and playground equipment. A new Municipal Building will soon be completed. The building will house the City Administrative Offices, the Police Department and the City Library.

Wolfforth is fortunate to have a fine school system (Frenship ISD) with many opportunities in educational fields. In May of 1994, the citizens approved a major bond issue for constructing additional buildings and renovation of several existing school buildings. Frenship ISD offers a wide range of curriculum, and students are afforded the opportunity to become academically and culturally well rounded.

The City of Wolfforth is located in southwest Lubbock County. Lubbock is rapidly growing in the southwest. Less than three miles separate the two city limit signs. The citizens of Wolfforth have all the advantages and conveniences of a large city and enjoy the quiet, friendly atmosphere of a small community.



For additional information contact:

City of Wolfforth

or

**Wolfforth Area Chamber of
Commerce & Agriculture**

P. O. Box 36

Wolfforth, Texas 79382

(806) 866-4215

Or

**Economic Development Manager
Southwestern Public Service Co.**

P.O. Box 1261

Amarillo, Texas 79170

806-378-2183 • 806-378-2176

This survey is provided as a service by



SOUTHWESTERN PUBLIC SERVICE COMPANY

EXHIBIT B



**The State of Texas
House of Representatives
Austin, Texas**

Robert L. Duncan
State Representative
District 84
Lubbock, Texas

Capitol Offices
P.O. Box 2910
Austin, Texas 78768-2910
512-463-0676
1-800-322-9538

FACSIMILE TRANSMISSION

DATE: August 22, 1995

TO: Mr. Scott Harris
Radio Station KLLL

FAX: 806/770 5363

FROM: Carol McCollum
in the office of State Representative
Robert L. Duncan, District 84

Telephone: 512/463-0676 FAX: 512/463-0904

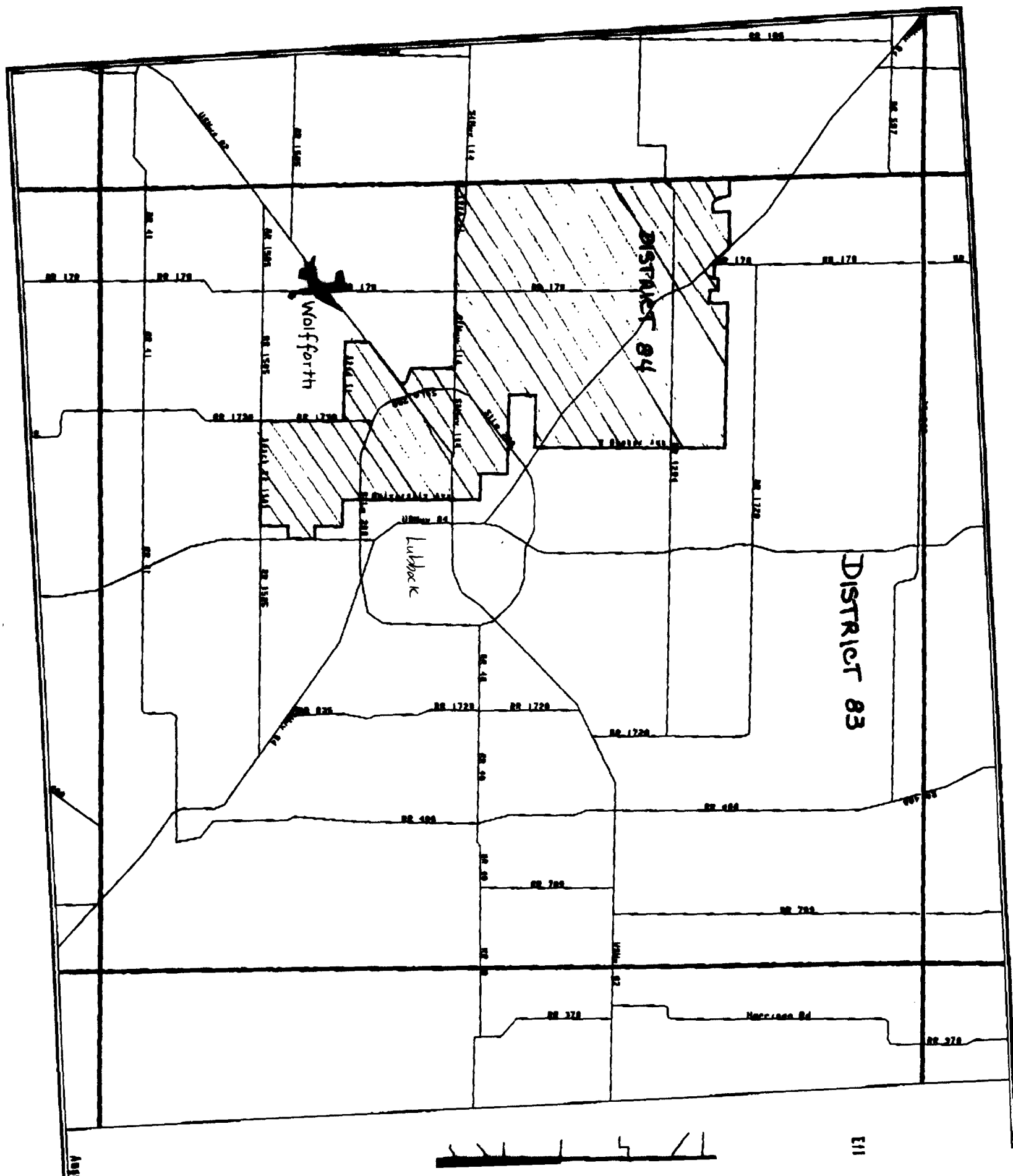
INSTRUCTIONS:

Scott, I hope that these maps fulfill your purpose. The enclosed maps were prepared by the Redistricting Office of the Texas Legislative Council. We have located Wolforth on the maps for you and as you can see, it is in Representative Delwin Jones' District 83.

If we may be of further assistance, please do not hesitate to let us know.

Total number of pages including cover: 3

SEP. -20' 94 (TUE) 15:41



LARRY COMBEST
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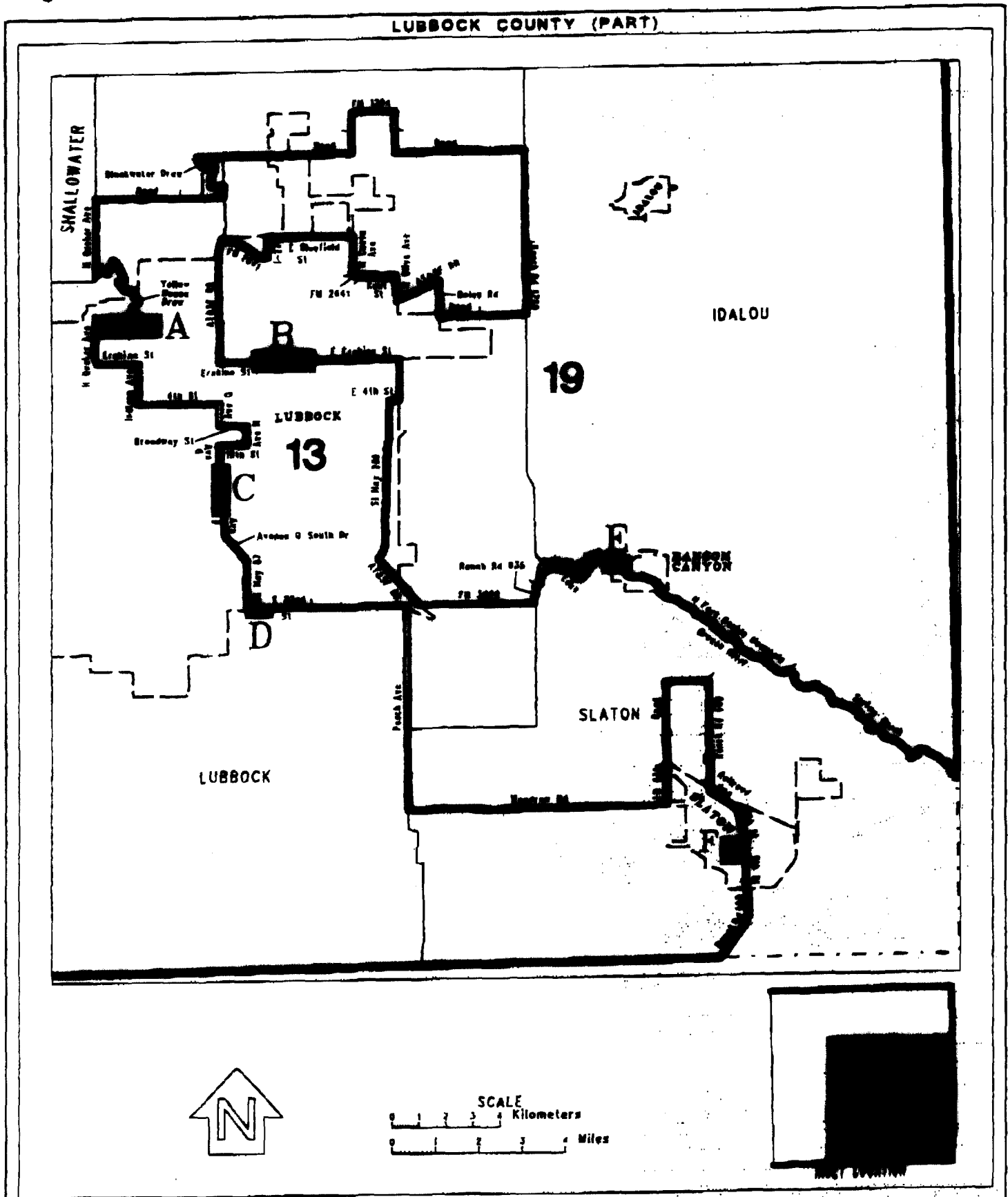
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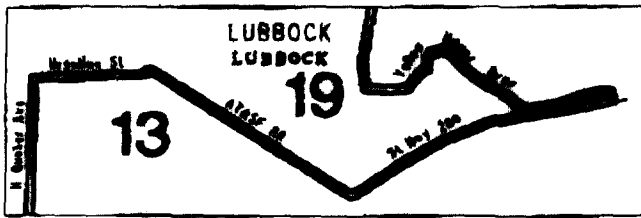
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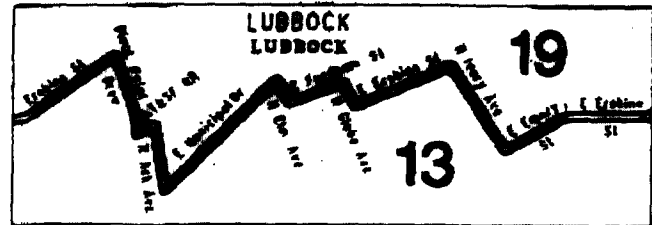
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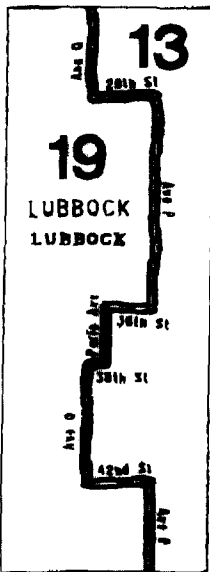
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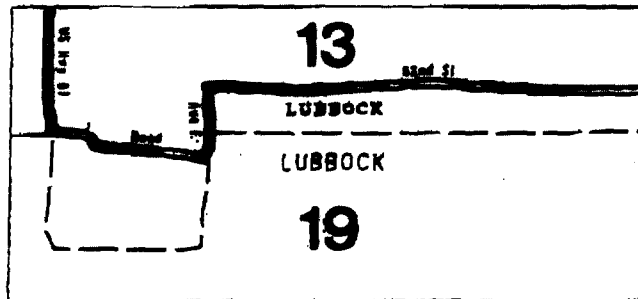
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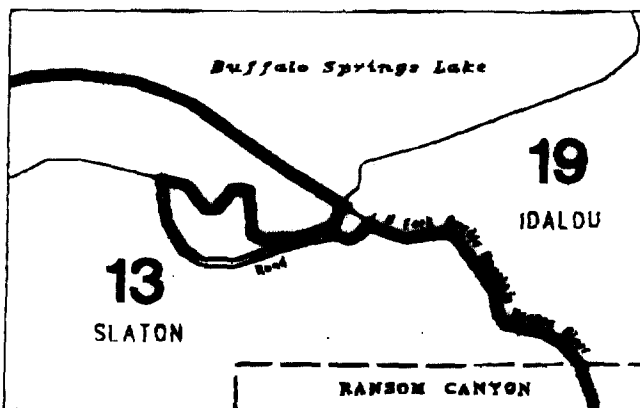
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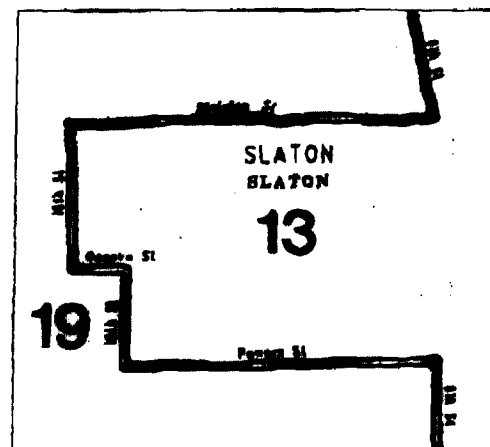
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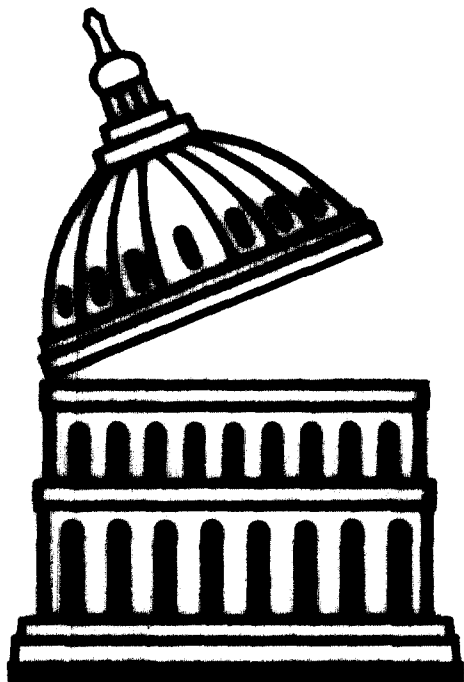
INSET F



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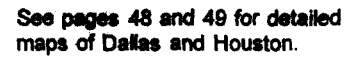
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